

STATEMENT OF BASIS (AI No. 43434)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0103683 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Suard Barge Service, Inc.
311 N. Barrios St.
Lockport, LA 70374

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Yvonne Baker

DATE PREPARED: July 19, 2007

1. PERMIT STATUS**A. Reason For Permit Action:**

Permit reissuance of an expired Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits -
LPDES permit effective date: April 1, 1998
LPDES permit expiration date: March 31, 2003

D. Date Application Received: June 26, 2007

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - oilfield service and barge rental facility**

Suard Barge Service, Inc. cleans oilfield equipment, compressor motors and drilling equipment. The wastewater generated during the cleaning activity is collected and sent to a disposal site at U.S. Liquids in Bourg, Louisiana. Suard Barge Service, Inc. is also a barge rental facility. The barges are washed and repaired at Bollinger Shipyard prior to being sent to the facility. No barge cleaning or barge repair occurs at the facility.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 1389

C. LOCATION - 311 North Barrios Street in Lockport, Lafourche Parish
Latitude 29° 38' 35", Longitude 90° 32' 56"

Statement of Basis for
Suard Barge Service, Inc.,
LA0103683, AI No. 43434
Page 2

3. **OUTFALL INFORMATION**

Outfall 001

This outfall has been deleted because the treatment system was never installed.

Outfall 002

Discharge Type: treated sanitary wastewater

Treatment: septic system

Location: at the point of discharge from the septic system prior to mixing with waters of the state

Flow: 500 GPD

Discharge Route: via on-site ditch to 40 Arpent Canal

Outfall 003

This outfall has been deleted because the facility no longer discharges ballast water.

Outfall 004

Discharge Type: industrial stormwater

Treatment: none

Location: at the point of discharge from the stormwater conveyance on the south central side of the facility prior to mixing with waters of the state

Flow: variable

Discharge Route: directly to Company Canal

Outfall 005

Discharge Type: industrial stormwater

Treatment: none

Location: at the point of discharge from the stormwater conveyance on the southwest side of the facility prior to mixing with waters of the state

Flow: variable

Discharge Route: directly to Company Canal

4. **RECEIVING WATERS**

STREAM - via on-site ditch to 40 Arpent Canal thence into Company Canal (Outfall 002)
directly to Company Canal (Outfalls 004 and 005)

BASIN AND SEGMENT - Terrebonne Basin, Segment 120304

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- d. drinking water supply
- f. agriculture

Statement of Basis for
Suard Barge Service, Inc.,
LA0103683, AI No. 43434
Page 3

5. TMDL STATUS

Subsegment 120304, Intracoastal Waterway from Houma to Larose, is listed on LDEQ's Final 2004 303(d) List as impaired for organic enrichment/low DO (EPA Category 5) and nutrients (EPA Category 5). To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Terrebonne Basin, those suspected causes for impairment which are not directly attributed to the oilfield service and barge rental point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Based on the evaluation of the effluent discharges, it was determined that the facility has the potential to discharge pollutants which may contribute to the organic enrichment/low DO and nutrients impairments of the receiving waterbody. With this in mind, a limitation for BOD was applied to the facility's treated sanitary wastewater discharge and TOC limits were placed on the stormwater discharges. LDEQ's position, as supported by the ruling in the lawsuit regarding water quality criteria for nutrients (Sierra Club v. Givens, 710 So.2d 249 (La. App. 1st Cir. 1997), writ denied, 705 So.2d 1106 (La. 1998), is that when oxygen-demanding substances are controlled and limited in order to ensure that the dissolved oxygen criterion is supported, nutrients are also controlled and limited. LAC 33:IX.2707.C.1.f.iii allows the establishment of effluent limitations based on an indicator parameter for the pollutant of concern. LDEQ's consistent approach to controlling nutrients where the WQMP does not otherwise require specific nutrient limitations is achieved by limiting the discharge of oxygen-demanding substances through a BOD₅ and a TOC limitation. Compliance with the BOD₅ and TOC limitations as the indicator parameters will result in the control of nutrients from the discharge sufficient to attain and maintain the applicable water quality standard. Effluent monitoring of the indicator parameter as conducted by the permittee in accordance with facility specific requirements of the permit in addition to LDEQ's ambient water quality monitoring program will allow for further evaluation by the Department to determine the effectiveness of the limitation. The reopener clause located in other conditions of the final permit allows the Department to modify or revoke and reissue the permit if the limitations as set on the indicator parameter are shown to no longer attain and maintain applicable water quality standards.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Outfalls 001 and 003 have been deleted. Outfalls 004 and 005 have been added to encompass the facility's stormwater discharges. The monitoring frequency for Outfall 002 has been increased.

7. COMPLIANCE HISTORY/COMMENTS

September 15, 2005 – an inspection noted minor damage from hurricane.

August 15, 2005 – an inspection was performed to observe the soil sampling in the excavated areas that were impacted from the improper storage of used oil. Soil samples are collected by Richard Murphy and analyzed by Pace Analytical.

May 18, 2005 – a Compliance Order (MM-C-04-0059) was issued. The order noted several violations revealed in 2004 inspections.

DMR Review/Excursions – No DMRs were on file for years 2004, 2005, and 2006.

Statement of Basis for
 Suard Barge Service, Inc.,
 LA0103683, AI No. 43434
 Page 4

DMR Review/Excursions – No DMRs were on file for years 2004, 2005, and 2006.

8. EXISTING EFFLUENT LIMITS

Outfall 001: treated wastewaters containing petroleum products

Pollutant	Monthly Average	Daily Maximum	Frequency
Flow	Report	Report	1/week
BOD	20 mg/L	30 mg/L	1/week
TSS	30 mg/L	45 mg/L	1/3 months
Fecal Coliform Colonies/100 ml	---	400	1/3 months
COD	---	250 mg/L	1/week
TOC	---	70 mg/L	1/week
Oil & Grease	---	15 mg/L	1/week
Phenols, Total	---	0.5 mg/L	1/week
Benzene	---	(*1)	1/week
Toluene	---	(*1)	1/week
Xylene, Total	---	(*1)	1/week
Ethyl Benzene	---	(*1)	1/week
Naphthalene	---	(*1)	1/week
Lead	---	(*1)	1/week
Poly Aromatic Hydrocarbons (PAH)	---	10 µg/L (*2)	1/week
Priority Pollutants (except pesticides, total phenols, benzene, toluene, total xylene, Ethylbenzene, naphthalene, lead, and PAH)	---	Report	1/6 months
Chlorides	500 mg/L	1000 mg/L	1/week
pH Min/Max Values	6.0 (min)	9.0 (max)	1/week

(*1) All effluent characteristics shall be sampled simultaneously. The sum of the highest three (30 effluent characteristics in any on sampling shall not exceed a Daily Maximum of 0.3 mg/L. Report individual component results and total of the highest three (3) components on the Discharge Monitoring Report (DMR).

(*2) The Daily Maximum value of any of the following PAH's shall not exceed 10 µg/L: Acenaphthene, Acenaphthylene, Anthracene, Benzo (a) Anthracene, Benzo (b) Fluoranthene, Benzo (k) Fluoranthene, Benzo (ghi) perylene, Benzo (a) pyrene, Chrysene, Dibenzo (a, h) Anthracene, Fluoranthene, , Fluorene, Indeno (1,2,3,cd) Pyrene, Phenanthrene, and pyrene

Statement of Basis for
Suard Barge Service, Inc.,
LA0103683, AI No. 43434
Page 5

Outfall 002: treated sanitary wastewater

Pollutant	Monthly Average	Weekly Average	Frequency
Flow	---	Report	1/6 months
BOD5	---	45 mg/L	1/6 months
TSS	---	45 mg/L	1/6 months
Fecal Coliform Colonies/100 ml	---	400	1/6 months
pH Min/Max Values	6.0 (min)	9.0 (max)	1/6 months

Outfall 003: incoming ballast and void water from customer barges

Pollutant	Monthly Average	Daily Maximum	Frequency
Flow	Report	Report	1/week
COD	---	250 mg/L	1/week
Oil & Grease	---	15 mg/L	1/week
Chlorides	500 mg/L	1000 mg/L	1/week
pH Min/Max Values	6.0 (min)	9.0 (max)	1/week

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 120304 of the Terrebonne Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Statement of Basis for
Suard Barge Service, Inc.,
LA0103683, AI No. 43434
Page 6

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for
 Suard Barge Service, Inc.,
 LA0103683, A1 No. 43434
 Page 7

Rationale for Suard Barge Service, Inc.

1. Outfall 002 - treated sanitary wastewater (estimated flow is 500 GPD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg.: Wkly. Avg. (mg/l)	<u>Reference</u>
Flow (GPD)	---:Report	
BOD	---:45 mg/l	Similar discharges, previous permit and LAG530000* (BPJ)
Fecal Coliform Colonies/100 ml	---:400 mg/l	Similar discharges, previous permit and LAG530000* (BPJ)
TSS	---:45 mg/l	Similar discharges, previous permit and LAG530000* (BPJ)
pH	6.0 - 9.0 su	Similar discharges, previous permit and LAG530000* (BPJ)

Treatment: septic system

Monitoring Frequency: Quarterly for all parameters at the point of discharge from the septic system prior to mixing with waters of the state.

Limits Justification: Limits are based on current guidance for similar discharges from other facilities, previous permit and the Class I Sanitary General Permit, LAG530000 effective November 1, 2002. The monitoring frequency has been increased to quarterly due to compliance issues.

2. Outfall 004 – industrial stormwater (estimated flow is variable)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg.: Daily Max. (mg/l)	<u>Reference</u>
Flow (GPD)	---:Report	
TOC	---:50 mg/l	Similar discharges* (BPJ)
Oil and Grease	---:15 mg/l	Similar discharges* (BPJ)
pH	6.0 - 9.0 su	Similar discharges* (BPJ)

Treatment: none

Monitoring Frequency: Quarterly for all parameters at the point of discharge from the stormwater conveyance on the south central side of the facility prior to mixing with waters of the state.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities.

3. Outfall 005 – industrial stormwater (estimated flow is variable)

Statement of Basis for
 Suard Barge Service, Inc.,
 LA0103683, AI No. 43434
 Page 8

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg.: Daily Max. (mg/l)	<u>Reference</u>
Flow (GPD)	---:Report	
TOC	---:50 mg/l	Similar discharges* (BPJ)
Oil and Grease	---:15 mg/l	Similar discharges* (BPJ)
pH	6.0 - 9.0 su	Similar discharges* (BPJ)

Treatment: none

Monitoring Frequency: Quarterly for all parameters at the point of discharge from the stormwater conveyance on the southwest side of the facility prior to mixing with waters of the state.

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities.

Note: Stormwater outfalls in addition to the SWPPP have been included in this permit based on compliance and housekeeping issues at the facility.

* Existing permits for similar outfalls
 BPJ Best Professional Judgement
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 is considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).